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BEFORE THE ARIZONA CORPORATION COMMISSION
 AZ CORP COMMISSION

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Chairman

JIM IRVIN

Commissioner

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Commissioner

ARIZONA CORPORATION COMMISSION FEB 4 4 43 PM '00

2000

DOCUMENT CONTROL

IN THE MATTER OF U S WEST)
 COMMUNICATIONS, INC.'S)
 COMPLIANCE WITH § 271 OF THE)
 TELECOMMUNICATIONS ACT OF)
 1996)
 _____)

Docket No. T-00000B-97-0238

**U S WEST'S COMMENTS
 RE: OPENESS OF PROCESS
 TO U S WEST**

On January 25, 2000, the Arizona Corporation Commission Staff issued a Report on various process issues raised by the CLECs concerning the OSS test. In the Report, Commission Staff acknowledges that "in an effort to preserve blindness and insure test integrity, [it has] withheld information regarding certain test objectives and the project schedule from U S WEST." *Report at 10.* U S WEST objected to the level of information being withheld from it and, as a result, the Commission Staff gave U S WEST until February 4, 2000 to "present information from other states relating to the type and amount of information disseminated to the BOC as part of the OSS testing process." This constitutes U S WEST's comments in response to Staff's inquiry.

I. INTRODUCTION

U S WEST requests that the Staff reconsider the type of information that it is withholding from U S WEST. The Staff's stated goal is, *inter alia*, "test integrity. Disclosure of a substantial amount of information currently planned to be withheld to U S WEST will actually enhance test integrity and accuracy. The only information that should be withheld from U S WEST is information about the date of a particular test, volumes of orders, and the products that will be

tested on certain days. U S WEST understands that it is necessary to “blind” it from such information to ensure test integrity. Nonetheless, all other information should be disclosed to it.

Disclosure of all remaining information is critical to the OSS test for several reasons. First, U S WEST should be able to advise Cap Gemini with respect to its wholesale business. Second, everyone involved in this process has the expectation and understanding that the test will be accurate. U S WEST therefore has a legitimate interest in reviewing Cap Gemini’s documents, plans, and in the development of test cases and test scripts to ensure that the test is accurate, appropriate, and compares appropriate retail and wholesale functions. Third, other RBOCs including Bell Atlantic, SBC, and Bell South were all provided with access to the very information that U S WEST is currently being denied. For example, these BOCs had access to the development of test scenarios, test scripts, and other similar information. U S WEST should be entitled to equivalent access.

II. U S WEST SHOULD HAVE BROAD ACCESS TO INFORMATION

Withholding information from U S WEST will cause unnecessary problems. U S WEST can already highlight several situations where access has allayed a problem that could jeopardize test integrity. For example:

1. **Attachment C of the Test Standards (Marketing Information Form):** Cap Gemini cannot execute tests using this form because it is incomplete. Examples of incomplete data include pre-order transactions, desired due date, and return type requested. Having U S WEST involved will help to prevent against such problems.

2. **Friendly Information Packet (Figure 2.4.1 in the test standards):** The “Friendly Package” has not been provided to U S WEST. Because Cap Gemini’s other documents have contained omissions and errors as described herein, U S WEST has reason to

believe the Friendlies Package also has omissions and errors. A review by U S WEST could help ensure its completeness.

3. **Test Cases:** U S WEST found several instances where there is insufficient information for Cap Gemini to run a test. For example, inputs into mandatory and applicable optional fields for the pre-order transactions and LSRs. Similar problems exist with repair tickets.

4. **Documentation on Test Cases and the Number of Accounts per Scenario:** U S WEST has spent substantial time mapping information from Cap Gemini to ensure it is complete and/or reconciled. Omissions and/or discrepancies have been detected by U S WEST and brought to Cap Gemini's attention. For example, Cap Gemini sent information to U S WEST to establish test accounts for unbundled loops. The problem, however, is unbundled elements will use friendlies as opposed to test accounts.

5. **Project Schedule:** The Project Schedule provides specific tasks, dates, responsible parties, and related information. U S WEST has reviewed this schedule and found a number of tasks to be missing. U S WEST and CLECs should both be involved to ensure it is complete.

These are just some of the examples U S WEST that highlight the importance of providing U S WEST with access to all information about the test except information about the date of a particular test, volumes of orders, and the products that will be tested on certain days.

III. OTHER RBOCS HAVE BEEN AFFORDED ACCESS TO SIMILAR INFORMATION.

Commission Staff specifically asked whether other RBOCs have been afforded access to information in their OSS tests to which U S WEST is currently being denied access. The master test plans of Bell Atlantic, SBC, and BellSouth all indicate that these RBOCs had access to the very information U S WEST is currently being denied. For example, Tables VIII (4 & 5) provide Bell Atlantic with access to the following information:

Develop detailed test plans
Develop test data specifications
Identify live data instances
Gather test data
Create test data, scripts
Generate transactions
Submit transactions
Conduct reviews, walk-throughs, interviews, surveys
Document reviews, walk-throughs, interviews, survey
Create data summaries and analyses

Bell Atlantic Master Test Plan (July 31, 1998).

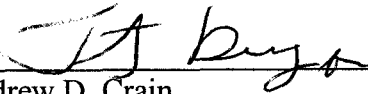
Similarly, BellSouth has had access to test scenarios, which include a description of the scenario, the applicable network configuration, the request type, the activity type, the flow-through indicator, and other items of that sort. *BellSouth-Georgia OSS Evaluation Master Test Plan, Appendix B3 (May 29, 1999)*. Similarly, Bell Atlantic and SBC both had access to test descriptions, dependencies and dates. *Bell Atlantic Master Test Plan (July 31, 1998)*; *The Public Utility Commission of Texas, Southwestern Bell (SWB) OSS Master Test Plan, Issue 3 (April 1999)*.

IV. CONCLUSION

Therefore, all factors mitigate in favor of disclosing this information to U S WEST. Providing U S WEST with access to this information will improve test integrity by improving the accuracy of the test as well as by preventing miscommunication and inaccurate disclosures. Providing access to U S WEST should also help the test to run more efficiently. Finally, other RBOCs have obtained access to this very type of information in their OSS tests.

Dated this 4th day of February 2000.

RESPECTFULLY SUBMITTED,
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